

**IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

R. ALEXANDER ACOSTA, SECRETARY  
OF LABOR, UNITED STATES  
DEPARTMENT OF LABOR,

Plaintiff,

v.

AT HOME PERSONAL CARE SERVICES,  
LLC, and ROBIN WRIGHT, Individually,

Defendants.

Civil No.: 1:18-cv-549 (LMB/IDD)

**JOINT REPLY TO FEBRUARY 22, 2019 ORDER**

Plaintiff R. Alexander Acosta, Secretary of Labor, United States Department of Labor (“Plaintiff”) and Defendants At Home Personal Care LLC and Robin Wright (“Defendants”) jointly file this Reply to this Court’s Order, dated February 22, 2019 (ECF Dkt. No. 71), stating as follows:

1. This Court Ordered the parties to “confer in an effort to prepare and submit, by no later than Friday, March 1, 2019, a stipulation” regarding overtime hours and back pay calculations for individuals listed in Plaintiff’s Amended Complaint (ECF Dkt. No. 12) (“Schedule A Individuals”) between January 26, 2016 and October 1, 2017. And, “[i]n the event the parties are unable to prepare such a stipulation, they must jointly file, by the same deadline, a notice explaining the reasons for the disagreement.” ECF Dkt. No. 71.

2. The parties have not been able to have a full meeting of the minds on hours and wage calculation discrepancies by today’s date because of the extensive documents and number of timesheets for the Schedule A Individuals for the relevant time period (such time records found

between Defendants' Bates Nos. 000069 and 014823) and the limited resources/staffing of Defendants' counsel.

3. The parties, by Counsel, agree to continue to work toward resolving remaining discrepancies in a Stipulation as contemplated by the Court's Order as soon as possible, by examining the underlying basis for the calculation discrepancies and to consider the other party's methodologies and proof.

4. In order to show the parties' efforts, the parties' respective calculations of overtime hours and wages, should liability be found, are attached as Exhibit A. Such calculations are subject to a full meeting of the minds between the parties on exchange and review of methodology, and proof.

Respectfully Submitted,

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